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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PAMELA DITTMAR,

Plaintiff,

vs.

CITY OF NORTH LAS VEGAS, a municipal
corporation,

Defendant.

Case No. 2:17-cv-02916-JAD-PAL

**STIPULATION AND ORDER TO
STAY PROCEEDINGS PENDING
RESOLUTION OF THE PARTIES'
MOTIONS REGARDING THE
DEPOSITIONS OF MAYOR JOHN
LEE AND CITY MANAGER RYANN
JUDEN**

(First Request)

Plaintiff Pamela Dittmar ("Plaintiff"), by and through her counsel, Melanie Hill Law PLLC, and Defendant City of North Las Vegas ("Defendant"), by and through its counsel, Kamer Zucker Abbott, stipulate and request that the Court stay these proceedings pending resolution of Plaintiff's Motion to Compel Depositions of Mayor John Lee and Ryann Juden (ECF No. 38) and Defendant's Motion for Protective Order as to the Requested Depositions of Mayor John Lee and City Manager Ryann Juden (ECF No. 36). In support of this Stipulation and Request, the parties state as follows:

1. On March 12, 2019, the parties stipulated to a briefing schedule for the motions regarding the depositions of Mayor John Lee ("Lee") and City Manager Ryann Juden ("Juden"), which was approved by the Honorable Magistrate Judge Peggy A. Lee on March 14, 2019 (ECF No. 33).

2. Defendant filed its opening brief on March 22, 2019 and Plaintiff filed her opening brief on March 23, 2019.

3. Both parties filed their response briefs on March 30, 2019 (ECF Nos. 41 and 42).

4. A hearing has thus far not been ordered on this dispute nor has a decision been issued.

5. As acknowledged in the stipulation, the parties agreed to not hold the Lee and Juden depositions until after a decision has been rendered. Likewise, other discovery dependent on the outcome of whether the depositions will take place has also been paused.

6. The parties have extended discovery twice. Rather than ask for additional extensions without knowing when the motions will be decided and in an effort to conserve expenditures and resources, the parties seek to stay all proceedings until the motions are decided.

7. Once the Court has ruled on the motions, the parties will work cooperatively together to submit appropriate deadlines to complete discovery and continue to move this case forward.

8. This request to stay proceedings is not sought for any improper purpose or other reason of delay. Rather, it is sought only to conserve the parties' respective resources and efficiently conduct discovery while awaiting the Court's decision on the motions regarding the Lee and Juden depositions.

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1 WHEREFORE, the parties respectfully request that the Court stay proceedings in this case
2 until the resolution of Plaintiff's Motion to Compel Depositions of Mayor John Lee and Ryann Juden
3 and Defendant's Motion for Protective Order as to the Requested Depositions of Mayor John Lee
4 and City Manager Ryann Juden.

5 DATED this 26th day of April, 2019.

6 Respectfully submitted,

7 MELANIE HILL LAW PLLC

8 /s/ Melanie A. Hill

9 Melanie A. Hill #8796

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14 Attorney for Plaintiff

15 Pamela Dittmar

Respectfully submitted,

KAMER ZUCKER ABBOTT

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Attorneys for Defendant

City of North Las Vegas

16 **IT IS SO ORDERED.**

17 May 2, 2019

18 **DATE**

19 
20 **UNITED STATES MAGISTRATE JUDGE**